Decision **PROPOSED DECISION OF ALJ COOKE** (Mailed 5/18/2016)

BEFORE THE PUBLIC UTILITIES COMMISSION OF THE STATE OF CALIFORNIA

Application of San Diego Gas & Electric Company (U902E) for Approval of Public Utilities Code Section 748.5 Customer Outreach Plan for 2014 and 2015.	Application 13-08-026 (Filed August 30, 2013)
And Related Matters.	Application 13-08-027 Application 13-09-001 Application 13-09-002 Application 13-09-003

DECISION ADDRESSING CUSTOMER EDUCATION AND OUTREACH PLANS FOR GREENHOUSE GAS ALLOWANCE PROCEEDS RETURN

Summary

This decision concludes that the requirement of Public Utilities Code § 748.5(b) that the California Public Utilities Commission pursue "adoption and implementation of a customer outreach plan for each electrical corporation, including, but not limited to, such measures as notices in bills and through media outlets, for purposes of obtaining maximum feasible public awareness of the crediting of greenhouse gas allowance revenues" has been met with the activities already undertaken and that additional statewide messaging related to the crediting of greenhouse gas allowance proceeds should occur as part of the statewide marketing campaign being pursued as part of Application 12-08-007 et al for Pacific Gas and Electric Company, San Diego Gas & Electric Company, and Southern California Edison Company. These utilities should also continue to

administer limited direct customer outreach. Proposed customer outreach plans for PacifiCorp and Liberty Utilities (CalPeco Electric) LLC are approved. Applications 13-08-026, 13-08-027, 13-09-001, 13-09-002, and 13-09-003 are closed.

1. Background

In Decision (D.) 12-12-033, approved in Rulemaking (R.) 11-03-012, the Commission adopted a methodology by which the investor-owned electric utilities (utilities or electric utilities) must return proceeds generated from the sale of greenhouse gas (GHG) allowances allocated to them by the California Air Resources Board (ARB) to residential, small business, and emissions-intensive and trade-exposed customers (EITE), pursuant to the California Cap-and-Trade regulation, Public Utilities (Pub. Util.) Code Section 748.5, and other applicable statutes, regulations, and Commission decisions.

Pub. Util. Code § 748.5(b) mandates that the Commission "require the adoption and implementation of a customer outreach plan for each electrical corporation, including, but not limited to, such measures as notices in bills and through media outlets, for purposes of obtaining maximum feasible public awareness of the crediting of greenhouse gas allowance revenues." To fulfill this mandate, in D.12-12-033, the Commission allocated approximately $3.96 million to Southern California Edison Company (SCE), Pacific Gas and Electric Company (PG&E), San Diego Gas & Electric Company (SDG&E), Liberty Utilities (CalPeco Electric) LLC (Liberty) and PacifiCorp[1] for outreach and education activities in 2013. D.12-12-033 also adopted certain parameters to guide outreach and

[1] Education and outreach budgets were allocated as follows: $1.7 million to PG&E, $1.4 million to SCE, $750,000 to SDG&E. PacifiCorp and Liberty were authorized to allocate up to 1.5% of their expected 2013 GHG allowance revenue toward outreach and education efforts, which translates to approximate 2013 budgets of $110,000 for PacifiCorp and $35,000 for Liberty.

education activities, including the requirement that education and outreach activities be competitively neutral. D.12-12-033 ordered the electric utilities to file advice letters setting forth proposed customer outreach and education activities for 2013 developed within the parameters of that decision. D.12-12-033 also directed each of the electric utilities to file applications for expanded education and outreach programs, including proposed budgets, for 2014-2015 — these applications are those proposals.

On March 15, 2013, each of the utilities filed advice letters proposing GHG customer education and outreach activities for 2013 and presenting the manner in which the non-volumetric residential GHG allowance proceeds returns, known as the California Climate Credit, would appear on customer bills. The Commission's Energy Division approved PacifiCorp and Liberty's 2013 customer education and outreach plans retroactive to May 15, 2013. However, in Resolution E-4611, adopted on October 17, 2013 (and after the applications in the instant consolidated proceedings were filed) the Commission rejected the 2013 customer education and outreach plans of PG&E, SCE, and SDG&E,[2] finding the plans to be out of compliance with D.12-12-033 and the parameters of the Energy Upgrade California program adopted in D.12-05-015. In particular, the Commission found that PG&E, SCE, and SDG&E's 2013 GHG customer education and outreach plans lacked competitive neutrality and failed to provide "coherent and accurate messaging about the GHG revenue return and the

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[2] Advice Letters rejected by Resolution E-4611 include PG&E Advice Letter 4203-E, SCE Advice Letter 2864-E, and SDG&E Advice Letter 2465-E.

Cap-and-Trade program"[3] in addition to failing to eliminate duplicative spending.

In Resolution E-4611, the Commission determined it was appropriate to consign PG&E, SCE, and SDG&E's approved 2013 GHG customer education and outreach budgets toward initial 2014 customer education and outreach activities while the California Public Utilities Commission (Commission) considered more long-term 2014-2015 outreach and education activities in the instant proceeding. The Commission ordered PG&E, SCE, and SDG&E to assign the entirety of their approved 2013 customer education and outreach budgets (approximately $3.85 million) to the California Center for Sustainable Energy (now the Center for Sustainable Energy, or CSE), the third-party administrator retained by the Commission to administer Energy Upgrade California, in order to develop consistent statewide messaging to coincide with the distribution of GHG allowance proceeds to residential, small business, and EITE customers.[4]

Resolution E-4611 also authorized PG&E, SCE, and SDG&E to book any utility-specific customer education and outreach costs related to the distribution of GHG allowance proceeds, such as messaging on bills, to the utilities' administrative memorandum accounts, authorized in D.12-12-033.

As of April 2014, GHG allowance proceeds were being returned to residential and small business customers and CSE had developed, coordinated,

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[3] Resolution E-4611 at 11.

[4] In Resolution E-4611, the Commission found that the scope of work of CSE, approved pursuant to the Energy Upgrade California program, includes messaging to customers pertaining to climate change; therefore, it is appropriate for CSE, as administrator of the Energy Upgrade California program, to develop messaging pertaining to the distribution of GHG allowance revenues.

and administered education and outreach activities associated with the initial distribution of GHG allowance proceeds.

In October 2015, in R.14-03-003, the Commission adopted D.15-10-032, which approved methodologies for natural gas utilities to use when calculating forecast and recorded GHG allowance proceeds and GHG costs associated with complying with Cap-and-Trade, and it approved an advice letter process for the utilities to use when forecasting and reconciling reasonable GHG costs and allowance proceeds. It also adopted a supplemental customer education and outreach plan to develop messaging to include in low-cost, natural gas-specific education and outreach activities targeted to customers that will receive the natural gas Climate Credit and laid out the approval process for the approval of utility outreach materials related to GHG costs and the California Climate Credit.[5]

2. Procedural History

Decision (D.) 12-12-033 directed each of the electric utilities to file applications to allow us to consider expanding education and outreach programs to maximize feasible public awareness of the crediting of greenhouse gas allowance proceeds, including proposed budgets, for 2014-2015. These applications are those proposals. An assigned Commissioner and Administrative Law Judge (ALJ) Scoping Memo was issued on November 7, 2013. At that time, the Scoping Memo established two phases: Phase 1 was to decide questions about administrative structure (i.e. whether the utilities, an independent third party, or some combination of the two should define and

[5] Although D.16-04-013 granted limited rehearing of D.15-10-032, the education and outreach portion of that decision was not affected by the rehearing grant.

implement overall outreach activities); and Phase 2 was to evaluate specific outreach activities and budgets for 2014 and 2015 and explore the appropriate procedural mechanism to develop and evaluate GHG customer education and outreach activities in 2016-2020.

The Commission oversaw mass-market outreach and education activities timed for the first California Climate Credit in April 2014, and has continued to pursue a low level of education activities for subsequent Climate Credit distributions issues pending a decision addressing specific goals, administrative structure and budgets for future years. Significant action in A.13-08-026, *et al.*, has been delayed, however, while the Commission authorized utilities to sell Low Carbon Fuel Standard Credits in D.14-05-021, adopted GHG allowance proceeds allocation formulas and distribution methodologies for emissions-intensive and trade-exposed entities in D.14-12-037, and adopted Low Carbon Fuel Standard proceeds allocation methodologies in D.14-12-083.

In addition, while the Commission's mandate is to achieve "maximum feasible public awareness of the crediting of greenhouse gas allowance revenues,"[6] the statute does not define what this means, nor has it defined any other ancillary goals or what budget levels might be appropriate to meet them. Therefore, on February 6, 2015, the assigned Commissioner and ALJ issued a Joint Assigned Commissioner's and Administrative Law Judge's Ruling and Scoping Memo to adjust the scope and schedule to better identify the objectives and scope of the GHG education and outreach programs with the assistance of interested parties through a workshop and comment process.

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[6] Pub. Util. Code § 748.5 (b).

The February 6, 2015, Scoping Ruling directed Energy Division staff to conduct a workshop to address the issues. Comments were filed on March 6, 2015. Following the workshop, Southern California Edison prepared and filed a workshop summary. Pursuant to the schedule adopted by the February 6, 2015 Scoping Ruling the parties filed Opening and Reply Briefs on the Workshop Report on May 29, 2015 and June 12, 2015, respectively.

2.1. Targetbase Report

In order to guide the utilities' expanded outreach and education activities in 2014-2015, D.12-12-033 directed the electric utilities to hire a research firm with marketing expertise to propose activities for a broader outreach and education program and to advise the Commission on whether the outreach and education program should be administered by a central statewide administrator rather than individually by each utility.[7] The utilities were directed to use the findings of research to develop their customer outreach and education plans for 2014-2015. In April 2013, the utilities retained the services of Targetbase to undertake the scope of work required in D.12-12-033. Targetbase compiled its findings into a report; the report was served on parties of R.11-03-012 on July 1, 2013 and incorporated into the record of R.11-03-012 by ruling on August 21, 2013. That ruling explicitly indicated that the "final report and all appendices will also become part of the record to the customer outreach and education plans applications to be filed on September 1, 2013 by the IOUs and will be considered in detail as a part of those applications." (R.11-03-012, August 21, 2013 ALJ Ruling at 2.)

[7] D.12-12-033 beginning at 135; Ordering Paragraph (OP) 12 and 13.

Key findings of the Targetbase report included limited knowledge of the Cap-and-Trade program among Californians but a general favorability toward the program, which is highly impacted by how the program is presented. In addition, Targetbase recommended that a statewide customer outreach and education program coordinated by a single, centralized, non-utility administrator should be adopted. The Targetbase report also estimated a $20 million per year expense would achieve a 40% to 60 % awareness level. (R.11-03-012, August 21, 2013 ALJ Ruling at Appendix 1-97.)

3. Issues Before the Commission

The February 6, 2015 Scoping Memo set forth nine issues to decide. These issues focused on developing the goals of the GHG education and outreach program as it relates specifically to the climate credit, who should conduct such education and outreach, an appropriate budget and timeframe, and coordination with Energy Upgrade California. In light of the delay in addressing these applications, this decision focuses on the need for additional outreach and marketing activities by PG&E, SCE, and SDG&E specifically about the return of GHG allowances and coordination of education and outreach for the climate credit with statewide education efforts like Energy Upgrade California.

4. PG&E, SCE, and SDG&E Applications

There appears to be a consensus amongst parties that customer awareness of the climate credit and its relation to California's climate change policy is low. Parties also generally support focusing education and outreach efforts on encouraging customer action to save energy. For example, CSE contends a main goal of the climate credit marketing, education, and outreach should be increasing action by California residents to better manage their energy use. Marin Clean Energy (MCE) believes education should focus on actions that consumers can take to address climate change and not explaining the mechanics of the Climate Credit. The Center for Accessible Technology and Greenlining Institute contend the focus of these efforts must not be on awareness alone but also on action.

The Commission has a statutory obligation to adopt customer education and outreach plans that achieve public awareness of the crediting of GHG allowance proceeds in a competitively neutral manner. The parties rightly point out that there is no statutory definition of "maximum feasible public awareness." As such, we must balance the cost to pursue awareness of the climate credit with the cost to achieve that awareness. Any education and outreach costs will decrease the amount of GHG allowance proceeds that are returned to customers and likewise reduce proceeds available to customers to take energy saving or emission reduction actions. The Targetbase report shows that a focus on awareness of the climate credit is a very expensive proposition ($20 million annually), which may not result in action towards energy savings in light of the small value of the climate credit to each customer.

In light of this record, it appears to make limited sense to pursue anadditional mass market education and outreach effort to inform people about the crediting of greenhouse gas allowance proceeds. At this point, we believe that the focus of any education and outreach should be on moving customers to action to make energy saving changes; therefore, we will not separately establish a budget or marketing approach for PG&E, SCE, and SDG&E for the awareness of crediting of greenhouse gas allowance proceeds.

Messaging related to the climate credit has already been incorporated into the request for proposals for a statewide marketing campaign that was considered in A.12-08-007 et al. The request for proposals was issued on

May 2, 2016 consistent with D.16-03-029. Therefore we dismiss the instant applications for PG&E, SCE, and SDG&E but direct the utilities to maintain their existing memorandum accounts to track the administrative costs associated with the activities they are ordered to perform below. Because the utilities have previously transferred their approved funding to CSE, we direct CSE to file a compliance report in this proceeding demonstrating the use of the outreach funds authorized in D.12-12-033, identifying any unspent funds, and to transfer the unspent funds, if any, to the currently authorized 2016 Statewide Marketing, Education, and Outreach budgets.currently authorized 2016 Statewide Marketing, Education, and Outreach budgetsTo the extent that the comments and briefs in this proceeding are useful in developing the messaging campaign by the selected vendor, this record is publicly available in A.13-08-026 et al and the Targetbase Report is available in R.11-03-012 in the August 21, 2013 ALJ Ruling at Appendix 1-97. The applications ordered in Ordering Paragraph 31 of D.12-12-033 to be filed 90 days after issuance of a final decision on outreach budgets, administrative roles and other issues are no longer necessary given consolidation of the California Climate Credit into the 2016 statewide marketing campaign.

However, we recognize that PG&E, SCE, and SDG&E should perform a minimum level of low-cost education as has occurred at the direction of the Energy Division over the last two years. Low- or no-cost outreach that is competitively neutral – for example, providing information within a customer newsletter or webpage about the Climate Credit that is derived from the "Message from the CPUC" letters sent to customers twice a year – is an appropriate way for the utilities to support greater awareness.

The utilities should continue to perform the administrative activities to support the Climate Credit that they have been performing over this time. These include activities identified in Ordering Paragraph 5 of Resolution E-4611, as well as those implemented at Energy Division's direction, such as the delivery of the "Message from the CPUC" Climate Credit letter. In support of each Climate Credit delivery period, PG&E, SCE, and SDG&E should ensure that Climate Credit recipients are informed about the credit within their bill, and ensure that recipients are provided with reasonable access to supporting information about the Climate Credit. Specifically, PG&E, SCE, and SDG&E shall:

1) Continue to notify Climate Credit recipients via on-bill communications, whenever a Climate Credit is provided.
2) Deliver to all recipients, via e-mail or bill insert, the Climate Credit letter from the Commission.
3) Ensure that their call center and customer service staff members are provided sufficient accurate information to answer ratepayer questions about the administration of the credit, directing customers to the Climate Credit webpage of the statewide outreach administrator (currently, http://energyupgradeca.org/credit) for additional information about the credit, California's efforts to fight climate change, and actions they can take to support these efforts.
4) Notify Energy Division Director or his designee of any barrier or delay to the foregoing that they encounter.

The Director of Energy Division may issue a letter to the utilities if Energy Division finds that PG&E, SCE, and SDG&E should alter their outreach activities in the future. It is our intent that the utilities will continue to provide reasonable, low-cost outreach information to their customers, especially during each Climate Credit delivery period.

5. PacifiCorp and Liberty

PacifiCorp and Liberty were permitted to establish their own outreach and education programs by advice letters approved by the Commission on May 15, 2013. Since those programs are underway and are unique to their service territories, PacifiCorp and Liberty request they be permitted to continue and that they not be required to participate in any outreach under the auspices of a third-party administrator. The PacifiCorp[8] and Liberty proposed programs have an annual expected cost of $110,000 and $42,600 respectively for 2014 and 2015 activities. The proposed programs take into consideration the results of the Targetbase study in structuring their activities with a focus on action-oriented messaging. Neither company is currently required to participate in statewide marketing and outreach activities.

In comments on the Scoping Ruling, both PacifiCorp and Liberty state that they are best equipped to develop and administer customer education and outreach on the crediting of GHG allowance proceeds. Both utilities cite to their unique customer bases, which they argue differ significantly from customers in the service territories of PG&E, SDG&E, and SCE. For example, PacifiCorp and Liberty state that their customer base is predominately residential, and many of Liberty Utilities' customers are second-family homes or rentals. For these reasons, PacifiCorp and Liberty maintain that they cannot reasonably participate in large-scale marketing efforts, such as television ads. Finally, if a third-party administrator is selected, Liberty and PacifiCorp argue that the utility should

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[8] PacifiCorp's application at 15, refers to "accompanying appendices, testimony, and exhibits." The assigned ALJ confirmed with PacifiCorp that no appendices, testimony, or exhibits were tendered.

remain the primary point of contact with its customers and should retain flexibility to refine and tailor the messaging developed by the third-party administrator.

SCE, SDG&E, MCE, Alliance for Retail Energy Markets (AReM), and CSE all support the inclusion of PacifiCorp and Liberty in a statewide marketing effort. Most parties cite to the need for consistency and uniformity as the primary basis for inclusion of these two utilities. ORA suggests that a hybrid approach that takes into account the size of the various utilities and the cost of various communications strategies is appropriate.

We find the argument that these two utilities present unique marketing challenges compelling and will not require their participation in the statewide marketing effort that is already underway. PacifiCorp and Liberty should pursue their proposed education and outreach activities as budgeted for 2016 through 2019, the term of the contract for the statewide marketing campaign. This spending level represents approximately 0.1% of each utility's annual authorized revenue requirement.

6. Safety Considerations

With the adoption of the *Safety Policy Statement of the California Public Utilities Commission* on July 10, 2014, the Commission has, among other things, heightened its focus on the potential safety implications of every proceeding. We have considered the potential safety implications associated with marketing and customer outreach and education of GHG allowance proceeds. ORA states that climate change itself poses significant health and safety risks, but ORA is not aware of any safety implications associated with education and outreach. PG&E states that giving the California Climate Credit as a lump sum results in a risk of increased bill volatility; however, PG&E does not state how bill volatility relates to safety.

The Commission finds that, generally, there are no significant safety concerns that arise from customer outreach and education pertaining to the distribution of GHG allowance proceeds.

7. Categorization and Need for Hearing

In Resolution ALJ 176-3322 dated September 19, 2013, the Commission preliminarily categorized these applications as ratesetting, and preliminarily determined that hearings were necessary. In the Assigned Commissioner and Administrative Law Judge's Scoping Ruling dated February 6, 2015, the Commission affirmed that these Applications were ratesettting, and determined that hearings may not be necessary. No hearings were held. However because no final determination was made to change the hearing determination, the *ex parte* rules as set forth in Rules 8.1, 8.2, 8.3, and 8.5 and §1701.3(c) continue to apply.

8. Comments on Proposed Decision

The proposed decision of ALJ Cooke in this matter was mailed to the parties in accordance with Section 311 of the Public Utilities Code and comments were allowed under Rule 14.3 of the Commission's Rules of Practice and Procedure. Comments were filed on June 7, 2016 by SCE and SDG&E. Changes were made to clarify that the utilities may continue to book administrative costs to their existing memorandum accounts, that the applications ordered in Ordering Paragraph 31 of D.12-12-033 to be filed 90 days after issuance of a final decision on outreach budgets, administrative roles and other issues are no longer necessary given consolidation of the California Climate Credit into the 2016 statewide marketing campaign, eliminating the utility requirement to transfer funds and submit a letter regarding the transfer and instead placing the reporting and transfer obligation on CSE. No reply comments were filed.

9. Assignment of Proceeding

Carla J. Peterman is the assigned Commissioner and Michelle Cooke is the assigned ALJ in this proceeding.

Findings of Fact

1. The original purpose of these proceedings was to establish marketing, education, and outreach plans and budget to accomplish maximum feasible awareness of the return of GHG allowance proceeds to customers for 2014 and 2015.

2. Significant action in A.13-08-026, et al., has been delayed, however, while the Commission authorized utilities to sell Low Carbon Fuel Standard Credits in D.14-05-021, adopted GHG allowance proceeds allocation formulas and distribution methodologies for emissions-intensive and trade-exposed entities in D.14-12-037, and adopted Low Carbon Fuel Standard proceeds allocation methodologies in D.14-12-083.

3. A focus on awareness of the climate credit is a very expensive proposition ($20 million annually) and does not guarantee customer action to save energy.

4. Parties support focusing education and outreach efforts on encouraging customer action to save energy.

5. PG&E, SCE, SDG&E currently notify Climate Credit recipients via on-bill communications, deliver the Climate Credit letter from the Commission via email or bill insert, ensure that call center staff members are provided information to answer ratepayer questions about the administration of the credit, directing customers to the Climate Credit webpage of the statewide outreach administrator (currently, http://energyupgradeca.org/credit) for additional

information about the credit, California's efforts to fight climate change, and actions they can take to support these efforts.

6. Messaging related to the climate credit has already been incorporated into the request for proposals for a statewide marketing campaign that was issued on May 2, 2016 consistent with D.16-03-029.

7. It is reasonable for PG&E, SCE and SDG&E to continue to track the costs for the remaining Climate Credit administrative activities they are ordered to perform.

8. The proposed customer outreach spending level by PacifiCorp and Liberty represents approximately 0.1% of each utility's annual authorized revenue requirement.

Conclusions of Law

1. There is no statutory definition of "maximum feasible public awareness."

2. The cost to pursue awareness of the climate credit should be balanced with the cost to achieve that awareness.

3. The focus of any education and outreach should be on moving customers to action to make energy saving changes, and therefore, no separate budget or marketing approach for PG&E, SCE, and SDG&E for the awareness of crediting of greenhouse gas allowance proceeds should be adopted, but rather should be incorporated into the statewide marketing campaign.

4. The applications ordered in Ordering Paragraph 31 of D.12-12-033 to be filed 90 days after issuance of a final decision on outreach budgets, administrative roles and other issues are no longer necessary given consolidation of the California Climate Credit into the 2016 statewide marketing campaign.

5. PacifiCorp and Liberty should pursue their proposed education and outreach activities as budgeted for 2016 through 2019, the term of the contract for

the statewide marketing campaign, and should not be required to participate in the statewide marketing campaign.

6. There are no significant safety concerns that arise from customer outreach and education pertaining to the distribution of GHG allowance proceeds.

O R D E R

IT IS ORDERED that:

1. Southern California Edison Company, Pacific Gas and Electric Company, and San Diego Gas & Electric Company must twice annually notify Climate Credit recipients via on-bill communications, whenever a Climate Credit is provided, and deliver to all recipients, via e-mail or bill insert, the Climate Credit letter from the California Public Utilities Commission.

2. Southern California Edison Company, Pacific Gas and Electric Company, and San Diego Gas & Electric Company must ensure that their call center and customer service staff members are provided sufficient accurate information to answer ratepayer questions about the administration of the climate credit, directing customers to the Climate Credit webpage of the statewide outreach administrator (currently, http://energyupgradeca.org/credit) for additional information about the credit, California's efforts to fight climate change, and actions they can take to support these efforts.

3. Southern California Edison Company, Pacific Gas and Electric Company, and San Diego Gas & Electric Company must notify the Director of Energy Division or his designee of any barrier or delay to the activities described in Ordering Paragraphs 1 and 2 that they encounter within one week of the delay occurring.

4. Southern California Edison Company, Pacific Gas and Electric Company, and San Diego Gas & Electric Company may maintain their existing memorandum accounts to track the costs associated with the activities the utilities have been directed to perform in Ordering Paragraphs 1, 2 and 3.

5. The Center for Sustainable Energy must file a compliance report in this proceeding within 45 days of the effective date of this decision demonstrating the use of the outreach funds authorized in Decision12-12-033, identifying any unspent funds, and must transfer any unspent funds to the currently authorized 2016 Statewide Marketing, Education, and Outreach budgets.

6. The customer outreach plan described by PacifiCorp in Application 13-09-001 is approved. PacifiCorp is authorized to spend a maximum of $110,000 annually between 2016 and 2019.

7. The customer outreach plan described by Liberty Utilities (CalPeco Electric) LLC in Application 13-09-003 is approved. Liberty Utilities (CalPeco Electric) LLC is authorized to spend a maximum of $42,600 annually between 2016 and 2019.

8. Applications 13-08-026, 13-08-027, and 13-09-002 are dismissed without prejudice.

9. Applications 13-09-001 and 13-09-003 are closed.

This order is effective today.

Dated ______________________________, at San Francisco, California.